

UNITED STATES DISTRICT COURT  
for the  
Southern District of Ohio

United States of America  
v.

Zhongping Stephen Sun

Case No. 1:20-mj-602

*Defendant(s)*

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 6/29/2020 through 7/14/2020 in the county of Hamilton in the  
Southern District of Ohio, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. § 2251(a) and (e)

Sexual Exploitation of Children

This criminal complaint is based on these facts:

See Attached Affidavit.

☒ Continued on the attached sheet.



*Complainant's signature*

TFO Mary Braun, FBI  
*Printed name and title*

Sworn to before me and signed in my presence.

Date: 8/13/2020



*Judge's signature*

City and state: CINCINNATI, OHIO

United States Magistrate Judge Karen L. Litkovitz  
*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Mary P. Braun, a Detective with the Cincinnati Police Department and a Task Force Officer with the Federal Bureau of Investigation (FBI), being duly sworn, hereby depose and state:

**I. INTRODUCTION**

1. I have been employed as a Police Specialist with the Cincinnati Police Department since 2004, and for the past ten years have been assigned to the Regional Electronics Computer Investigations (RECI) Task Force working on crimes involving computers and computer-based crimes against children and others. Through my work in the Cincinnati Police Department, I have become familiar with the methods and schemes employed by persons who trade and collect child pornography as well as the manner in which adults seduce children for hands-on offenses. As a Task Force Officer, I have investigated federal criminal violations involving crimes against children, child pornography, and human trafficking. I have received formal training in the investigation of these matters at the Cincinnati Police Academy, the Federal Bureau of Investigation, and the National Center for Missing and Exploited Children, through other in-service training, and through private industry. As part of the Federal Bureau of Investigation's Cincinnati Human Trafficking and Child Exploitation Task Force, in 2011, I was deputized by the United States Marshals Service as a Special Deputy United States Marshal, thereby authorized to seek and execute arrest and search warrants supporting a federal task force.

2. During my career as a Detective and Task Force Officer, I have participated in various investigations involving computer-related offenses and executed numerous search warrants to include those involving searches and seizures of computers, computer equipment, software, and electronically stored information. I have received both formal and informal training in the detection and investigation of computer-related offenses. As part of my duties as a Task Force Officer, I investigate criminal violations relating to child exploitation and child pornography

including the illegal production, distribution, transmission, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252(a), and 2252A.

3. As a Task Force Officer, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

4. I am familiar with the facts and circumstances of this case. The information contained in this affidavit is either personally known to me, based upon my own personal observations and review of various investigative reports and records, or has been provided to me by other law enforcement agents or sworn law enforcement personnel. Because this affidavit is being submitted for the limited purpose of obtaining an arrest warrant. I have not included in this affidavit all information known by me relating to the investigation. I have set forth facts to establish probable cause for the charges in the complaint. I have not withheld any evidence or information that would negate probable cause.

## **II. INVESTIGATION AND PROBABLE CAUSE**

5. Your affiant was contacted by Police Officer (PO) Katie Werner from the Cincinnati Police Department Vice Unit. PO Werner had stopped Zhongping Stephen Sun, (henceforth referred to as SUN) date of birth XX/XX/1967, Social Security Number XXX-XX-1659 during a prostitution investigation. SUN was arrested and cited to court for prostitution and soliciting. Additionally, SUN's mobile phone, an iPhone 11<sup>1</sup> was seized and a Hamilton County Common Pleas search warrant was applied for and obtained. The analysis of the phone was completed by Cincinnati Police Department Criminalistics Unit.

6. When going through the iPhone results, PO Werner found numerous videos saved to the phone which show SUN having sexual contact with a female who appeared to be a juvenile. Vice

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<sup>1</sup> From experience, I know iPhones are manufactured outside the state of Ohio.



Units were able positively identify her as a 15 year old female, with date of birth 11/XX/04 (henceforth referred to as MINOR VICTIM 1).

7. Your affiant reviewed the videos that were recorded on SUN's mobile phone and found 18 that clearly showed SUN and MINOR VICTIM 1 engaged in sexual contact. It is also clear that SUN is holding the mobile phone during the recordings. The following is a description of several:

- a. IMG\_0046 – a 1 minute, 38 second video, recorded on 06/29/2020 at 7:58 PM which shows MINOR VICTIM 1, lying naked on a bed. SUN is penetrating the victim's vagina with his penis.
- b. IMG\_0051 – a 3 minute, 53 second video, recorded on 07/06/2020 at 11:52AM, in which MINOR VICTIM 1 is performing oral sex on SUN.
- c. IMG\_0060 – a 1 minute, 42 second video, recorded on 07/10/2020 at 3:30 PM, in which MINOR VICTIM 1 is rubbing SUN's erect penis with her hand while licking his chest. At the 1 minute, 25 second mark she puts his penis into her mouth.
- d. IMG\_0063 – a 4 minute, 15 second video, recorded on 07/10/2020 at 3:46 PM, showing MINOR VICTIM 1 lying face down on the bed. SUN vaginally penetrates her first with his penis, then his finger and then his penis, again.
- e. IMG\_0073 – a 1 minute, 16 second video, recorded on 07/14/2020 at 4:35 PM, in which MINOR VICTIM 1 is performing oral sex on SUN's erect penis while SUN is rubbing her vaginal area with his hand.

8. All of the videos were recorded at the Red Roof Inn & Suites, 8870 Governor's Hill Drive, Cincinnati, Ohio 45249. Registry information obtained from Red Roof Inn showed that SUN had rented a room on each of the days a video was made.

### III. CONCLUSION

9. Based on the above information noted in this Affidavit, I submit that there is probable cause to believe that SUN produced child pornography in violation of 18 U.S.C. §§ 2251(a) and (e). I, therefore, respectfully request that an arrest warrant be issued authorizing the arrest of Zhongping Stephen Sun.



Task Force Officer MARY BRAUN  
Federal Bureau of Investigation

Subscribed and sworn to before me on this 13 day of August, 2020.



KAREN L. LITKOVITZ  
UNITED STATES MAGISTRATE JUDGE